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October 4, 2021

Honorable Donna Ryu
Magistrate Judge
United States District Court
EFILED

Re: United States v. Jose Cruz Caceres
NO. 4:21-MJ-70900-3
Request to calendar further hearing regarding conditions of release

Dear Magistrate Judge Ryu:

I am the attorney for Jose Cruz Caceres.

After consultations with your courtroom deputy and government counsel, I request that this matter be added to your calendar on Friday, October 15, 2021 at 1:00 p.m. for a hearing on a modification of a condition of his pretrial release. Please be advised my client requires a Spanish-speaking interpreter. I will request my client and the relevant parties appear by zoom.

I will submit a memorandum prior to that hearing to provide an outline of the issues to be presented to the Court. In brief, Mr. Cruz Caceres is charged in this matter with drug offenses. This Court released Mr. Cruz Caceres from custody on house arrest, with GPS monitoring, in early June 2021. According to his Pretrial Services Officer, Mr. Cruz Caceres has done very well. In September 2021, the parties submitted a stipulation to eliminate house arrest as a condition of pretrial release, but to impose a curfew. The Pretrial Services Officer supported that change. This Court signed that stipulation. At the request of the individual who signed the unsecured bond, counsel will now ask this Court to reduce the amount of the unsecured bond set in June 2021. Government counsel advised undersigned counsel that he did not agree with the proposed new modification.

DATED: October 4, 2021

Respectfully submitted,

/s/
Scott A. Sugarman